

Message

From: Ramanauskas, Peter [ramanauskas.peter@epa.gov]
Sent: 1/27/2017 9:00:09 PM
To: Moore, Tammy [moore.tammy@epa.gov]
CC: Beedle, Michael [beedle.michael@epa.gov]
Subject: Kipp Update

Hi Tammy,

In follow up to our discussion, the team will be drafting a response to the company's groundwater monitoring proposal that will likely hit on the following points:

- 1) Inform Kipp that they may have to install new monitoring wells if they maintain the position that the sporadic PCB detections in groundwater are the result of contaminant drawdown during installation. Otherwise, they should treat detections as valid.
- 2) Present options on the method, location, and frequency of groundwater sample collection (i.e. passive vs. grab sampling, quarterly at "X" wells, etc.)
- 3) Present trigger criteria and what steps must be taken if the trigger criteria is exceeded (e.g. exceeding WDNR's enforcement standard after 2 sequential events means additional hydraulic control to capture PCB contamination).
- 4) Analytical procedure to achieve WDNR's low enforcement standard (Congener/Homolog vs. Aroclor analysis)

We hope to share a draft response with WDNR next week and get it to the company soon after that.

Let me know if you have any questions.

Thanks,
Peter